

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|----------------------------|---|-------------------|
| HENRY F. HEWES, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | 1:19-cv-09158-LJL |
| |) | |
| ALBAMA SECRETARY OF STATE, |) | |
| <i>et al.</i> , |) | |
| |) | |
| Defendants. |) | |

**DEFENDANT MAINE STATE DEPARTMENT’S MOTION TO JOIN AND ADOPT
DEFENDANTS’ MOTION TO DISMISS**

Defendant Maine State Department hereby moves this Honorable Court to permit it to join Defendants’ Joint Motion to Dismiss (**Dkt. No. 54**). In support of this Motion, the Maine State Department respectfully states the following:

1. On December 19, 2019, those Defendants who had entered an appearance filed a Joint Motion to Dismiss (**Dkt. No. 54**).
2. On January 22, 2020, Plaintiff filed an Amended Complaint (**Dkt. No. 59**), which was served on the Maine State Department on January 23 (*see* **Dkt. No. 60**).
3. Pursuant to this Court’s December 20, 2019 Order (**Dkt. No. 57**), the Defendants who filed the Joint Motion to Dismiss renewed that Motion by letter dated February 8, 2020 (**Dkt. No. 61**).
4. The Joint Motion to Dismiss contains the same arguments that the Maine State Department would raise to support the dismissal of Plaintiff’s claims against it.

5. Accordingly, in the interest of judicial economy, the Maine State Department seeks to join Defendants' Joint Motion to Dismiss and adopt the arguments raised therein rather than submit a separate motion.

WHEREFORE, for the foregoing reasons, Defendant Maine State Department requests that the Court permit it to join and adopt Defendants' Joint Motion to Dismiss (Dkt. No. 54).

Respectfully submitted,


Dated: Augusta, ME
February 10, 2020

/s/ Jason Anton
Jason Anton
Assistant Attorney General
Jason.Anton@maine.gov

MEMORANDUM ENDORSED

Office of the Attorney General
Six State House Station
Augusta, ME 04333
207-626-8800

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

3/10/2020

Certificate of Service

The undersigned hereby certifies that he electronically filed the above document with the Clerk of Court using the CM/ECF system, which will serve a copy on all counsel of record.

The undersigned further certifies that on February 10, 2020, he caused a copy of the above document to be mailed by the U.S. Postal Service to the following non-CM/ECF participant:

Henry F. Hewes
515 Madison Avenue
Suite 22B
New York, NY 10022

Dated: February 10, 2020

/s/ Jason Anton
Jason Anton
Assistant Attorney General